



July 22, 1983

LOW 83-3.078

Mr. Vernon Krimmel  
Sporlan Valve Company  
611 East 7th Street  
Washington, Missouri 63090



R00007438  
RCRA Records Center

Dear Mr. Krimmel:

Enclosed please find a copy of the Resource Conservation and Recovery Act Compliance Inspection Report for your facility. I believe it is self-explanatory.

In a phone conversation between Ms. Sandra Carroll of my staff and Mr. Joe Boing of Sporlan Valve on July 14, 1983, it was ascertained that Sporlan Valve Company wishes to be classified as a generator only. It was also understood that the company is actively seeking to delete their Treatment, Storage and Disposal (TSD) status with the Environmental Protection Agency Region VII. If Sporlan Valve Company should decide to retain interim status, then additional requirements found in 40 CFR Part 265 would become applicable.

By August 29, 1983, Sporlan Valve Company must remedy all of the Unsatisfactory Features noted in the attached inspection report. By that date, documentation demonstrating compliance with each recommendation must be submitted. This documentation must consist of the following items: 1) certification in writing that the facility is actively pursuing a TSD deletion; 2) the entire Contingency Plan; 3) the entire Personnel Training Plan; 4) certification in writing that ignitable hazardous waste is stored greater than 50 feet from the property line; 5) completed HWG-1A forms (previously mailed) for waste oil and electroplating wastes; and 6) a copy of all receipts, contracts, written communication, etc. from Bliss Oil Company.

The Missouri Hazardous Waste Management Law contains a unique statutory requirement for generators. The regulations, found in 10 CSR 25-7.050(2)(A)6 cross-referenced to 10 CSR 25-7.050(3)(F), require a waste confinement system capable of containing a spill in the hazardous waste storage area. By August 29, 1983, Sporlan Valve Company must submit a brief description and a proposed completion date for a waste confinement system.

Hazardous waste storage areas must be inspected weekly. Although not required by regulation, it is strongly recommended that inspections be recorded in a log book.

In review of copies of recent manifests included with the inspection report, the proper Department of Transportation shipping name was

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368  
1915 Southridge Drive  
Jefferson City, Missouri 65102  
(314) 751-3241

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director



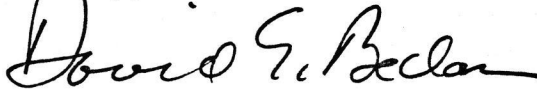
Mr. Vernon Krimmel  
July 22, 1983  
Page 2

incorrect. Federal regulations in 49 CFR 172.101(c)(10) require that for hazardous waste shipments the word "waste" be included before the name provided in the Hazardous Materials Table of this section, unless the word "waste" is included in the proper shipping name. The waste trichloroethylene is also a hazardous substance if shipped in quantities over 1000 pounds; therefore, the letters "RQ" must be included before or after the proper Department of Transportation shipping name as required by 49 CFR 172.203(c)(2). Examples of this would be "RQ Waste Trichloroethylene UN 1710 ORM-A".

Submit all documentation to Ms. Sandra Carroll of this office and to the St. Louis Regional Office.

If you have any questions or if we can be of assistance to you, please don't hesitate to contact Ms. Carroll or the St. Louis Regional Office.

Sincerely,

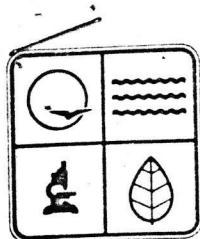


David E. Bedan, Ph.D.  
Director  
Waste Management Program

DEB:SC:dr

Enclosures

cc: St. Louis Regional Office  
David Doyle, U.S. EPA Region VII  
Carol Eighmey, MDNR  
Joe Boing, Sporlan Valve



27.100  
Sporlan Valve Company  
June 1, 1983

## RCRA COMPLIANCE INSPECTION REPORT

### FACILITY

Sporlan Valve Company  
611 East 7th Street  
Washington, Missouri 63090  
314 - 239-3732

MO I.D. #03489  
EPA I.D. #MODO06299200

### INTRODUCTION

Inspector: Tom Ellis  
Date of Inspection: May 23, 1983  
Facility Hazardous Waste Activity: Generator

This facility of Sporlan Valve Company is engaged in the manufacture of thermostatic expansion valves for the air conditioning and refrigeration equipment industries. Plant operations include the machining of brass, steel and copper; removal of cutting oils; electroplating of some parts; and assembly.

Hazardous waste generation types, rates and disposition at this facility is as follows:

1. Waste solvents from cleaning and degreasing of machined metal parts - Trichloroethylene, Petroleum Naptha, and an industrial thinner. Rate of generation of these waste solvents was not known by Sporlan Valve officials nor has this waste type been registered with Missouri at this time. The first manifested shipment of waste solvents took place on April 28, 1983. From that time until the date of the inspection approximately 15-55 gallon drums of waste solvent had been accumulated in the storage area. Small quantities of waste solvent generated by Sporlan Valve's facility at 1699 West Main Street in Washington are also brought to this facility for storage. The rate of generation from 1699 West Main was reported to the inspector as less than 20 gallon/month. Waste solvents are picked up by a licensed transporter and taken to a T.S.D. facility in Ohio operated by Safety-Kleen Corporation.
2. Waste oils from mechanical equipment lubrication are generated at a rate of approximately 300 gallon/month. These oils are accumulated in an open concrete pit outside the building. This pit has a capacity of approximately 600 gallons. This pit was last pumped out by Gateway Petroleum on May 3, 1983. (See attached receipt).
3. Electroplating wastes are produced at an unknown rate. The rate of generation and characteristics of this waste could not be identified by the inspector upon questioning of Sporlan Valve personnel. This waste is presently discharged to the City of Washington sanitary sewers. This waste has not been registered with Missouri.

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
8460 Watson Road St. Louis, Missouri 63119 (314) 849-1313

**Christopher S. Bond** Governor  
**Fred A. Lafser** Director  
St. Louis Regional Office

UNSATISFACTORY FEATURES

1. There was no documentation available indicating the hazardous waste storage area is inspected and maintained per 10 CSR 25-7.011 (3)E 1.-A. as referenced by 10 CSR 25-7.050.
2. There was no documentation available indicating that the Personnel Trailing, Preparedness and Prevention, and Contingency Planning and Emergency Procedures requirements of 10 CSR 25-7.050(2) (A) have been complied with.
3. There was not a waste confinement structure in the hazardous waste storage area that meets the criteria of 10 CSR 25-7.050(3) (F).
4. The storage area, which contained ignitable waste, was not at least 50 feet from the property line per 10 CSR 25-7.050(3) (G).
5. The generator registration requirements of 10 CSR 25-5.010(1), (2) and (3) requiring registration with the Department of all hazardous waste generated has not been complied with.
6. Proper manifesting of waste solvents (including trichloroethylene) has been instituted as of April 28, 1983. However, prior to that time shipments of waste solvents off-site were not manifested. This past practice was in violation of 10 CSR 25-5.010(4). The transporter that picked up the un-manifested waste solvents acted in violation of 10 CSR 25-6.010(2) (B).

COMMENTS

The inspector initially met with Mr. Vernon Krimmel of Sporlan Valve Company, 611 E. 7th Street, Washington, Missouri at approximately 2:30 p.m., Monday, May 23, 1983. Mr. Krimmel indicated he did not have a title. The inspector reviewed with Mr. Krimmel the purpose of the visit, the wastes produced at both facilities of Sporlan Valve Company in Washington, Missouri, Sporlan Valve's manifests to date, and the documentation Sporlan Valve needed to comply with the Personnel Trailing, Preparedness and Prevention and Contingency Planning requirements of the Missouri law. It was noted that Sporlan Valve had not developed the required documentation as noted in the unsatisfactory features section of this report.

During the initial interview with Mr. Krimmel, it was noted that Sporlan Valve had only begun manifesting waste solvents on April 28, 1983. When asked about this, Mr. Krimmel responded that their previous waste hauler, Jerry Russell Bliss, had not informed Sporlan Valve that the wastes needed to be manifested and that the Bliss Company continued to follow that same procedure they had always used for handling of the waste solvents and oils. Mr. Krimmel went on to explain that Sporlan Valve had always dumped the waste petroleum naptha in the waste oil pit and the waste trichloroethylene was stored separately. He also related that Bliss picked up all of Sporlan Valve's waste solvents and oils until January or February of 1983. Since that time, Safety-Kleen Corporation has picked up the waste solvents by manifests and Gateway Petroleum has picked up the waste oils.



When Mr. Krimmel was questioned concerning the disposition of the plating wastes (acid wastes) produced at Sporlan Valve, Mr. Krimmel asked Mr. Omar Tobben, Plant Manager, to explain this aspect of their operations. Mr. Tobben explained that Sporlan Valve was working with the City of Washington to meet their sewer discharge standards and that Sporlan had cut way back on their plating operations. The inspector could not discern from Sporlan's records or the conversation the quantity or quality of the plating wastes.

After the interview and review of documents, the inspector was led by Mr. Krimmel on a brief tour of the plant in which he pointed out the manufacturing process areas and the hazardous waste storage area. Hazardous waste storage is accomplished in three separate areas. Two areas are set aside as drum storage areas with the waste oils stored in an open pit outside the building. The inspector pointed out to Mr. Krimmel the deficiencies of the storage areas as noted in the unsatisfactory features section of the report. This completed the inspection of this facility.

#### RECOMMENDATIONS

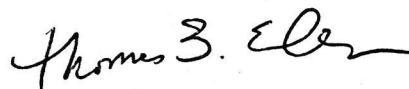
1. It is necessary that inspections of the hazardous waste storage area be conducted and the area be maintained per 10 CSR 25-7.011(3)E1.-4. as referenced by 10 CSR 25-7.050.
2. Documentation to demonstrate compliance with the Personnel Training, Preparedness and Prevention, and Contingency Planning requirements as noted in 10 CSR 25-7.050(2) (A) must be developed.
3. A waste confinement structure must be provided in the storage area to meet the criteria of 10 CSR 25-7.050(3) (F).
4. The storage area must be relocated so that ignitable wastes are stored at least 50 feet from the property line per 10 CSR 25-7.050(3) (G).
5. Sporlan Valve must register all hazardous wastes produced per the generator requirements of 10 CSR 25-5.010(1), (2) and (3).
6. Continue manifesting all shipments of hazardous waste.

APPROVED:



F. Donald Maddox, P. E.  
Regional Administrator  
St. Louis Regional Office

PREPARED BY:



Tom B. Ellis, P. E.  
Environmental Engineer  
St. Louis Regional Office

FDM/TBE/bkl

Attachments

**Gateway Petroleum Co., Inc.**

WASTE OIL SERVICE

P. O. BOX 2676 - E. ST. LOUIS, ILLINOIS 62202

(618) 271-1170 - (618) 271-0880

DATE 5-3 1983  
M Sporlan Valve Co  
611 E 7 Washington MO

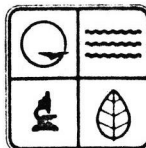
1	approx 600 gal		
2	waste oil. fees		
3	BSW		
4			
5	g ag		
6			
7			
8	John Krimm		
9			
10			
11	21917		

PLATE 3



HAZARDOUS WASTE MANIFEST DOCUMENT  
MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P. O. Box 1368, Jefferson City, Missouri 65102

314-751-3241



MANIFEST DOCUMENT NUMBER

0	3	4	8	9	0	0	1	0	0	1
Generator I.D. No.					Waste I.D. No.			Shipment No.		

Part 1 to be completed by the generator

(Instructions for completing and handling this document are on the reverse side)

Name	Identification	Address	Telephone No.	Date Shipped or Rec'd.
Item 1. Generator <b>Sporlan Valve Company</b>	Generator I.D. No. <b>03489</b>	<b>611 E 7th Street</b>		
Item 2. Transporter <b>Commercial Cartage Company</b>	Transporter No. <b>MO0006491286</b> <b>T18168</b>	<b>Washington, Mo. 63090</b> <b>343 Arminister Dr.</b> <b>Fenton, Mo. 63026</b>	<b>239-3732</b> <b>343-8500</b>	<b>4/28/83</b> <b>4-28-83</b>
Item 3. Treatment, Storage or Disposal Facility <b>Safety-Kleen Corporation</b>	T, S, D, Facility Permit No. <b>040980587364</b>	<b>581 Melliken S.E.</b> <b>Hebron, OH. 43025</b>	<b>614-929-3532</b>	<b>4-29-83</b>
Item 4. Proper DOT Shipping Name <b>Petroleum Naphtha</b>	DOT Hazard Class <b>UN1255</b> <b>Combustible</b>	DOT Label Required or Exceptions <b>Hazard Waste</b>	Quantity <b>20</b>	Units* <b>1 2 3 4 5</b>

\*Circle one: 1. tons; 2. gallons; 3. cubic yds; 4. drums 55 gallon; or 5. Pounds

Item 5.

Immediate Emergency Response Information	24-hour emergency telephone numbers
In the event of a spill, contact the National Response Center, U. S. Coast Guard, 800-424-8802	Chemtrec 800-424-9300
SPECIAL HANDLING INSTRUCTIONS	

Item 7. GENERATOR CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the Missouri Department of Natural Resources.

Generator's Signature Vernon Kimmel Date 4/28/83

Part 2

to be completed by the transporter

3. TRANSPORTER CERTIFICATION. This is to certify acceptance of the hazardous waste shipment. Date accepted for Shipment:

Signature Gordon D. Neal Date 4-28-83 RA-A-1061

4. TREATMENT, STORAGE OR DISPOSAL CERTIFICATION. This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

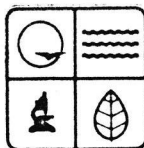
Signature Sturme Date 4-29-83

Item 6.

Placards Provided or Affixed			
Shipper's Check List			
	DOT Labels Applied and Secure		DOT Auth. Containers
	Proper DOT Name on all Packages		Checked for Proper Sealing
	Air Cargo Only		Peligro Label Applied

HAZARDOUS WASTE MANIFEST DOCUMENT  
MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P. O. Box 1368, Jefferson City, Missouri 65102

314-751-3241



MANIFEST DOCUMENT NUMBER

0	1	9	1	1	0	0	1	0	0	1
Generator I.D. No.					Waste I.D. No.			Shipment No.		

Part 1 to be completed by the generator (Instructions for completing and handling this document are on the reverse side)

Name	Identification	Address	Telephone No.	Date Shipped or Rec'd.	
Item 1. Generator	Generator I.D. No.				
Starlan Valve Company	01911	611 E. 7th Street Washington, Mo. 63090	239-3732	4/28/83	
Item 2. Transporter	Transporter No.				
Commercial Cartage Company	MO0006491286 T 18168	343 Axminster Dr. Fenton, Mo. 63026	343-8500	4-28-83	
Item 3. Treatment, Storage or Disposal Facility	T, S, D, Facility Permit No.				
Safety-Kleen Corporation	OH0980587364	581 Milliken S.E. Hebron, OH 43025	614-929-3532	4-29-83	
Item 4. Proper DOT Shipping Name	DOT Hazard Class	DOT Label Required or Exceptions	Quantity	Units*	Weight (If applicable)
Trichloroethylene	UN1710 ORMA	Hazard Waste	7	1 2 3 ④ 5	

\*Circle one: 1. tons; 2. gallons; 3. cubic yds; ④. drums; 55 gallon; or 5. Pounds

Item 5.

## Immediate Emergency Response Information

In the event of a spill, contact the National Response Center,  
U. S. Coast Guard, 800-424-8802

## SPECIAL HANDLING INSTRUCTIONS

24-hour emergency  
telephone numbers

Chemtrec 800-424-9300

Item 6.

## Placards Provided or Affixed

## Shipper's Check List

DOT Labels Applied and Secure	DOT Auth. Containers
Proper DOT Name on all Packages	Checked for Proper Sealing
Air Cargo Only	Peligro Label Applied

Item 7. GENERATOR CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the Missouri Department of Natural Resources.

Generator's Signature Vernon Kimmel Date 4/28/83

Part 2

to be completed by the transporter

TRANSPORTER CERTIFICATION. This is to certify acceptance of the hazardous waste shipment. Date accepted for Shipment:

Signature Gordon R. Spaul Date 4-28-83 RA-A-1061

TREATMENT, STORAGE OR DISPOSAL CERTIFICATION. This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

Signature Van Sturum Date 4-29-83

Department Final Copy



Facility:

Sporton Valve Co.  
611 E. 7th St.

Date:

5/23/83

Facility Representative:

Vernon Krimmel / Omar Tabben

Missouri I.D. # 03489

EPA I.D. # MO0086299200

Title:

No title

Phone Number 314-239-3732

Is this facility a TSD?

NO

Transporter?

NO

Provide a brief description of the manufacturing process.

produce thermostatic expansion valves for air conditioning  
and refrigeration equipment - machinery of brass, steel,  
and copper - removal of cutting oils, plating and  
assembly

List the hazardous wastes produced:

	Waste	Amount/month	Kilogram/month	I.D. #	Disposition
1.	Waste Solvents (Pet Naphtha Trichloroethylene) (No records available at plant)			001	Res Run
2.	Waste Oils	300 gal/mo		002	Res Run
3.	Plating Wastes	?		none	City of Washington San. Services
4.					
5.					
6.					
Total					

Subtract amount going to Resource Recovery or sewer

all

Amount subject to generator fee

none

(subject if over 2000 lbs. of waste is produced)

Is generator fee applicable to this facility? Yes ☐ No ☒If so, is the fee being paid? Yes ☐ No ☒If the total amount of hazardous waste produced is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes ☐ No ☒

Inspector's Name:

Tom Ellis

Title:

Env. Eng.

Office:

SLPD

Bliss picked up unmanifested loads  
of solvents until Jan or Feb 1983  
primarily trichloroethylene - Pet Naphtha  
was previously put in the used oil  
collection tank - previously picked up by  
Bliss.

- only manifests to date  
copies are attached

## A. MANIFESTS 10 CSR 25-5.010(4)

- Generator's Missouri and EPA I.D. Number ☒
- Serially increasing shipment number ☒
- Generator's name, address, phone number, EPA I.D. number ☒
- All transporters' names, addresses, phone numbers, and EPA I.D. numbers ☒
- Hazardous waste management facility name, address, phone number, and EPA I.D. number ☒
- Proper DOT shipping name and hazard class ☒
- Quantity, container type, and number of units being shipped ☒
- Emergency instructions and special handling procedures ☒
- Proper certification ☒
- Manifest properly signed and dated ☒

- Time between generator and facility signature less than 7 days ☒
- Manifests returned within 30 days ☒
- If not, exception generator report submitted within 45 days ☒
- Completed manifests submitted to Department quarterly ☒

Comments on manifests

## B. CONTAINERIZATION AND LABELING 10 CSR 25-5.010(6)

- Waste properly containerized and labeled before being transported off-site ☒
- Containers marked "Hazardous Waste" ☒

## HAZARDOUS WASTE GENERATOR CHECKLIST

## C. STORAGE STANDARDS 10 CSR 25-7.050

17. Facility inspected and maintained ..... ☒ *NEED TO DOCUMENT*  
 18. Ignitable and reactive wastes properly handled ..... ☒  
 19. Date of accumulation marked ..... ☒

For storage of less than 1000 kg proceed to Section G.  
 For storage of over 1000 kg complete Sections D, E, & F.

## D. PERSONNEL TRAINING 10 CSR 25-7.050 cross-referenced to 10 CSR 25-7.011(3)(F)

20. Completed classroom or on-the-job training ..... ☒ *NEED TO DOCUMENT*  
 21. Job title, description, and name of person filling position ..... ☒  
 22. Written record of the type and amount of training given ..... ☒  
 23. Documentation confirming that training has been given ..... ☒

E. PREPAREDNESS AND PREVENTION 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(4) *NEED TO DOCUMENT*

24. Internal communication or alarm system ..... ☒  
 25. Device in the hazardous waste operation area capable of summoning emergency assistance ..... ☒  
 26. Fire control, spill control, and decontamination equipment available ..... ☒  
 27. Adequate water supply for fire control equipment ..... ☒  
 28. Adequate and proper safety equipment available ..... ☒  
 29. Adequate aisle space ..... ☒  
 30. Arrangements with local emergency agencies ..... ☒

F. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.050(2)(A) cross-referenced to 10 CSR 25-7.011(5) *NEED TO DOCUMENT*

31. Contingency Plan ..... ☒  
 32. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste ..... ☒  
 33. Describe formal arrangements with emergency agencies ..... ☒  
 34. Names, addresses, and phone numbers (home & office) of emergency coordinators ..... ☒  
 35. Emergency equipment including its description and location ..... ☒  
 36. Evacuation plan if applicable ..... ☐

Comment: \_\_\_\_\_

## G. CONTAINER STORAGE 10 CSR 25-7.050(3)

37. Containers in good condition ..... ☒  
 38. Containers storing incompatible wastes or products are separated or protected from each other ..... ☒  
 39. Containers kept closed in storage ..... ☒  
 40. Containers stored within a waste confinement structure (if applicable) that meets the criteria of 10 CSR 25-7.050(3)(F) ..... ☒  
 41. Containers of ignitable or reactive waste are stored at least 50 feet from the property line ..... ☒

Comment: \_\_\_\_\_

H. STORAGE TANKS 10 CSR 25-7.050(4) *waste oil storage above ground*

42. Tanks in good condition ..... ☒  
 43. Procedure for inspecting tanks ..... ☒  
 44. Above ground tanks - adequate spill confinement structures ..... ☒  
 45. Underground tanks that cannot be entered have adequate leak detection systems ..... ☒  
 46. Leak detection procedure and schedule developed and used ..... ☒  
 47. Open tanks have \_\_\_\_\_ ft. freeboard ..... ☒  
 48. Incompatible wastes in tanks safely and properly stored ..... ☒  
 49. Volatiles are not placed in open tanks ..... ☒  
 50. Ignitable or reactive wastes in tanks safely and properly stored ..... ☒  
 51. Ignitable or reactive wastes in covered tanks stored in accordance with NFPA's buffer zone requirements ..... ☒  
 52. Controls to prevent overfilling ..... ☒  
 53. Daily inspection of overfilling control equipment ..... ☒  
 54. Daily inspection of freeboard in uncovered tanks ..... ☒

## HAZARDOUS WASTE STORAGE TANKS

Waste Contained

Volume of Tank

_____	_____
_____	_____
_____	_____
_____	_____

Comment: \_\_\_\_\_

*Plating waste discharge needs to be characterized*  
*Waste solvents in quantities below 100 gell/m are brought to this plant from Sparlan Valves facility (MO0000879102) at 1699 West Main St. in Washington. Only wastes produced from that facility.*  
*Mr. Joe Boing of Sparlan Valves St. Louis office (647-2775) has the waste oil receipts from pick-up and may have receipts from pick-up of solvents.*

Inspector's Signature

*Thomas B. Ellis*



*Gateway Petroleum Co., Inc.*

P.O. BOX 1046  
BELLEVILLE, ILLINOIS 62223  
618-271-0880

April 29, 1983

Mr. Boing  
Sporlan Valve Co.  
7525 Sussex Ave.  
St. Louis, MO. 63143

Dear Sirs:

This is to inform our customers that we are fully permitted and licensed by the Illinois E.P.A., Missouri Department of Natural Resources and the Federal E.P.A.

We have in the past and will continue to comply with all future regulations of all E.P.A. agencies.

The following is a list of our permits:

MISSOURI

Resource Recovery Facility No. - RR05  
Generator Identification No. A-1837  
Hazardous Waste Transporter License No. H-1063

ILLINOIS

Special Waste Hauling Permit #0153  
Illinois Site No. 16304532

U.S.E.P.A. No. ILD-092358548

Sincerely,

GATEWAY PETROLEUM CO., INC.